

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-00022-Z

DEFENDANTS' SUPPLEMENTAL RULE 26(a)(1) INITIAL DISCLOSURES

Defendants Planned Parenthood Gulf Coast (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood of South Texas, Inc. (“PP South Texas”), Planned Parenthood of Cameron County, Inc. (“PP Cameron County”), Planned Parenthood San Antonio, Inc. (“PP San Antonio”) (collectively, the “Texas Affiliates”) and Planned Parenthood Federation of America, Inc. (“PPFA” and, together with the Texas Affiliates, the “Defendants”) hereby supplement Defendants’ Rule 26(a)(1) Initial Disclosures as follows:

I. RULE 26(a)(1)(A)(i) WITNESSES

Defendants disclose the following list of persons who Defendants believe are likely to have discoverable information that Defendants may use to support their claims or defenses, unless solely for impeachment, based on Defendants’ knowledge to date.

Name	Contact Information	Subject Matter
Jeffrey Hons ¹ Former PP South Texas President & Chief Executive Officer	This witness should be contacted through Arnold & Porter.	See Initial Disclosures.
Vickie Barrow-Klein PPFA Chief Financial Officer and Chief Operating Officer	This witness should be contacted through O’Melveny.	May have knowledge of PPFA operations, PPFA’s relationship with the Texas Affiliates, and PPFA’s general corporate structure.
Unknown individuals currently or formerly employed by the U.S. Department of Health & Human Services (“DHHS”)	200 Independence Avenue, S.W., Washington, D.C. 20201	May have knowledge of facts related to the administration of the federal Medicaid program.

¹ Defendants include Mr. Hons here merely to alert Plaintiffs to Mr. Hons’s new status as a former employee of PP South Texas following his recent retirement.

Name	Contact Information	Subject Matter
Unknown individuals currently or formerly employed by the Louisiana Department of Health (“LDH”)	628 N. 4 th Street, Baton Rouge, Louisiana 70802	May have knowledge of facts related to PPGC’s eligibility to participate and participation in Louisiana Medicaid and the Louisiana termination proceedings and related litigation.
Unknown individuals currently or formerly employed by the Centers for Medicare and Medicaid Services (“CMS”)	7500 Security Boulevard, Baltimore, Maryland 21244	See Initial Disclosures.
Individuals currently employed by Texas Health & Human Services Commission (“HHSC”), which may include, for example, Cecile Erwin Young, HHSC’s Executive Commissioner, or Stephanie Stephens, HHSC’s Chief Medicaid & CHIP Services Officer	North Austin Complex, 4601 W. Guadalupe St., Austin, TX 78751-3146	See Initial Disclosures.
Unknown individuals currently or formerly employed by the Texas HHSC Office of Inspector General (“HHSC-OIG”)	11501 Burnet Road, Building 902, Austin, Texas 78758	See Initial Disclosures.
Stuart Bowen Former Inspector General, HHSC-OIG	4010 Long Champ Drive, #1, Austin, TX 78746	May have knowledge of facts related to Texas’s decision to terminate the Texas Affiliates from Texas Medicaid, the preliminary injunction proceedings, and the order enjoining Texas from terminating the Texas Medicaid Provider Agreements.

Name	Contact Information	Subject Matter
Ted Spears, M.D. Chief Medical Officer, HHSC-OIG	11501 Burnet Road, Building 902, Austin, Texas 78758	May have knowledge of facts related to Texas's decision to terminate the Texas Affiliates from Texas Medicaid.
Charles Smith Former Executive Commissioner, HHSC	Unknown (Austin, Texas)	May have knowledge of facts related to Texas's Final Termination Notice, the preliminary injunction proceedings, and Texas's payment of Medicaid claims during the pendency of preliminary injunction.
Individuals or Fed. R. Civ. P. 30(b)(6) Witnesses for Baylor College of Medicine ("BCM")	One Baylor Plaza, Houston, TX 77030	Defendants dispute BCM's relevancy to the claims alleged, but if the Court disagrees and deems BCM relevant, then BCM witnesses may have knowledge of facts related to the research studies and/or negotiations alleged in Relator's Complaint.
Individuals or Fed. R. Civ. P. 30(b)(6) Witnesses for University of Texas Medical Branch	301 University Boulevard, Galveston, TX 77555	May have knowledge of facts related to the research studies and/or negotiations alleged in Relator's Complaint.
Individuals or Fed. R. Civ. P. 30(b)(6) Witnesses for Texas Medicaid & Healthcare Partnership	Unknown (Austin, Texas)	May have knowledge of facts related to Medicaid claims submitted by the Texas Affiliates and Medicaid reimbursements.

The Defendants also reserve the right to call any witness identified in Plaintiffs' complaints, any witnesses that Defendant identifies in response to Plaintiffs' discovery requests, and any witness that Plaintiffs identify as persons with relevant knowledge.

These supplemental disclosures are made without prejudice to Defendants' rights to change or supplement the responses, Defendants' rights to assert privileges or objections with respect to any requests for discovery, and Defendants' rights to introduce at trial additional evidence and documents as warranted by the development of the claims and facts underlying this lawsuit.

Dated: August 25, 2022

Respectfully submitted,

O'MELVENY & MEYERS LLP

/s/ Danny S. Ashby
DANNY S. ASHBY
Texas Bar No. 01370960
dashby@omm.com
JUSTIN R. CHAPA
Texas Bar No. 24074019
jchapa@omm.com
MEGAN R. WHISLER
Texas Bar No. 24079565
mwhisler@omm.com
2501 N. Harwood Street, Suite 1700
Dallas, TX 75201
Tel: (972) 360-1900
Fax: (972) 360-1901

LEAH GODESKY
(admitted *pro hac vice*)
lgodesky@omm.com
1999 Avenue of the Stars, 8th Floor
Los Angeles, CA 90067
Tel: (310) 553-6700
Fax: (310) 246-6779

BLACKBURN BROWN LLP
RYAN PATRICK BROWN
Texas Bar No. 24073967
brown@blackburnbrownlaw.com
1222 S. Fillmore Street
Amarillo, TX 79101
Tel: (806) 371-8333
Fax: (806) 350-7716

*Attorneys for Planned Parenthood
Federation of America, Inc.*

ARNOLD & PORTER KAYE SCHOLER LLP

/s/ Tirzah S. Lollar

CRAIG D. MARGOLIS

(admitted *pro hac vice*)

Craig.Margolis@arnoldporter.com

TIRZAH S. LOLLAR

(admitted *pro hac vice*)

Tirzah.Lollar@arnoldporter.com

CHRISTIAN D. SHEEHAN

(admitted *pro hac vice*)

Christian.Sheehan@arnoldporter.com

601 Massachusetts Ave, NW

Washington, DC 20001-3743

Tel: (202) 942-6000

Fax: (202) 942-5999

CHRISTOPHER M. ODELL

Texas State Bar No. 24037205

Christopher.Odell@arnoldporter.com

700 Louisiana Street, Suite 4000

Houston, TX 77002-2755

Telephone: +1 713.576.2400

Fax: +1 713.576.2499

BLACKBURN BROWN LLP

RYAN PATRICK BROWN

Texas State Bar No. 24073967

brown@blackburnbrownlaw.com

1222 S. Fillmore

Amarillo, TX 79101

Tel: (806) 371-8333

Fax: (806) 350-7716

Attorneys for Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2022, Defendants' Supplemental Rule 26(a)(1) Initial Disclosures were served upon all counsel of record for Plaintiffs by e-mail.

/s/ Danny S. Ashby
Danny S. Ashby